## **REMARKS**

Claims 1-27 are pending in the present application. By this amendment, claims 1, 14-15, 21, and 25 are amended. Applicants respectfully request reconsideration of the present claims in view of the following remarks.

## I. Prior Art Rejections

## Claim Rejections under 35 U.S.C. §103(a)

Claims 1-27 are rejected under 35 U.S.C. §103(a) as being unpatentable over Microsoft Word 97 (hereinafter "Word 97") in view of United States Patent No. 6,182,028 to Karaali et al. (hereinafter "Karaali"). This rejection is respectfully traversed. Applicants respectfully request reconsideration of the present claims in view of the following remarks.

As amended, claim 1 recites that a computer-implemented method for correcting text comprises receiving a text selection comprising a plurality of text components derived from different input sources such that at least one of the text components comprises a stochastic text component derived from a stochastic input source or a series of stochastic input sources; receiving a command to display alternatives for the text selection; parsing the text selection into the text components; retrieving the stochastic model for the stochastic text component from its associated stochastic input source or series of input sources; combining the stochastic model with other text components to produce a list of alternatives for the text selection; and displaying the list of alternatives for the text selection on a display device.

Word 97 does not disclose, teach, or suggest a method for correcting text as recited in claim 1. On the contrary, based on screenshots pp. 1-11, Word 97 is concerned with determining if inputted text is spelled correctly and is grammatically correct by referencing a dictionary and a grammar checker. If the text is not spelled correctly or is not grammatically correct based on the dictionary reference and grammar checker, then Word 97 highlights the incorrect text and provides alternatives for a user to choose from to correct the mistake. This is not analogous to receiving a text selection comprising text components that are derived from different input sources and that comprise at least one

stochastic text component derived from a stochastic input source or a series of stochastic input sources because Word 97 teaches using keyboard/mouse entry of text, either by directly inputting text into a document using a keyboard and mouse or by opening a saved document containing text entered using a keyboard and mouse, which is a single, non-stochastic input source that inputs non-stochastic text into a document because the text can be accurately determined by the computer.

Examiner Bashore acknowledges that the teaching of Word 97 fails to teach or suggest these claim features and relies on the teaching of Karaali to allegedly cure the above-noted deficiencies in the teaching of Word 97. However, like Word 97, Karaali does not disclose, teach, or suggest these claims features as recited in claim 1. Instead, Karaali discloses a method for disambiguating the parts-of-speech of words in a text by considering information from both local and expanded context to select locally predicted tags and alternative tags based on expanded context, respectively, from a set of probabilistically annotated tags associated with the words. The tags selected based on information from local context may be determined by using a stochastic algorithm for part-of-speech disambiguation based on local context. This fails to teach receiving a text selection comprising text components derived from different input sources that comprise at least one stochastic text component derived from a stochastic input source or a series of stochastic input sources because Karaali teaches using a stochastic algorithm for determining locally predicted tags based on information from local context, without suggesting that the text containing the words for which the method disambiguates the part-of-speech was received from different input sources, or that the text comprises at least one stochastic text component derived from a stochastic input source or series of stochastic input sources.

Word 97 also does not disclose, teach, or suggest retrieving a stochastic model for the stochastic text component from its associated stochastic input source or series of input sources and combining the stochastic model with other text components to produce a list of alternatives for the text selection. Instead, Word 97 teaches referencing a dictionary and a grammar checker to determine if inputted text is spelled correctly and is grammatically correct and to provide alternatives for a user to choose from to correct the mistake, without suggesting that the alternatives generated by the dictionary and grammar

checker are stored in stochastic models which are then combined with other text components to produce the list of alternatives, or that the dictionary and grammar checker are stochastic input sources from which such stochastic models are retrieved. Moreover, as discussed above, Word 97 fails to teach that the text checked by the dictionary and grammar checker comprises at least one stochastic text component derived from a stochastic input source.

Examiner Bashore acknowledges that the teaching of Word 97 fails to teach or suggest these claim features and relies on the teaching of Karaali to allegedly cure the above-noted deficiencies in the teaching of Word 97. However, like Word 97, Karaali does not disclose, teach, or suggest these claim features as recited in claim 1. On the contrary, Karaali teaches determining locally predicted tags from a set of probabilistically annotated tags by using a stochastic algorithm for part-of-speech disambiguation based on local context. This is not analogous to the method as recited in claim 1 because Karaali fails to teach that the probabilistically annotated tags or the locally predicted tags are stored in a stochastic model which is combined with other tags to produce a list of alternative tags or that the tag-context disambiguator, which determines the locally predicted tags from the set of probabilistically annotated tags, is a stochastic input source from which such a stochastic model is retrieved. Instead, the tag-context disambiguator determines the locally predicted tags by using an algorithm such as a stochastic algorithm.

Since both of the teaching of Word 97 and Karaali fail to teach or suggest a computer-implemented method for correcting text as recited in independent claim 1, the combined teaching of Word 97 and Karaali cannot make obvious Applicants' claimed invention embodied in independent claim 1. Further, since claims 2-20 depend from claim 1 and recite additional claim features, the combined teaching of Word 97 and Karaali cannot make obvious claims 2-20. Accordingly, withdrawal of this rejection is respectfully requested.

As amended, claim 21 recites that a computer-implemented method for correcting text comprises the steps of receiving a text selection from a user; receiving a command to display alternatives for the text selection; submitting the text selection to a correction scope model to determine if a scope of correction should be adjusted; if the correction

scope model determines the scope of correction should be adjusted, then receiving from the correction scope model a text unit that includes the text selection and at least one adjacent word; producing a list of alternatives for the text unit; and displaying the list of alternatives for the text unit on a display device.

Word 97 does not disclose, teach, or suggest a method for correcting text as recited in claim 21. On the contrary, as previously discussed, Word 97 is concerned with determining if inputted text is spelled correctly and is grammatically correct by referencing a dictionary and a grammar checker, without discussing also referencing a correction scope model to determine if the scope of correction should be adjusted, and if so, then receiving from the correction scope model a text unit that includes the text selection and at least one adjacent word.

Examiner Bashore acknowledges that the teaching of Word 97 fails to teach or suggest this claim feature and relies on the teaching of Karaali to allegedly cure the above-noted deficiencies in the teaching of Word 97. However, like Word 97, Karaali does not disclose, teach, or suggest a method for correcting text as recited in claim 21. Instead, Karaali discloses a method for disambiguating the parts-of-speech of words in a text by considering information from both local and expanded context to select locally predicted tags and alternative tags based on expanded context, respectively, from a set of probabilistically annotated tags associated with the words. The locally predicted tags may be determined by using a stochastic algorithm, a system of rules for part-of-speech disambiguation based on local context, a neural network, a decision tree, and a genetic algorithm. Similarly, the alternative tags may be determined using a system of rules for disambiguating parts-of-speech based on expanded context, a neural network, a decision tree, and a genetic algorithm. However, Karaali fails to teach that when determining the locally predicted tags and the alternative tags, a correction scope model is also referenced to determine if the scope of correction should be adjusted, and if so, then receiving from the correction scope model a text unit that includes the text selection and at least one adjacent word.

Since both of the teaching of Word 97 and Karaali fail to teach or suggest a computer-implemented method for correcting text as recited in independent claim 21, the combined teaching of Word 97 and Karaali cannot make obvious Applicants' claimed

invention embodied in independent claim 21. Further, since claims 22-27 depend from claim 21 and recite additional claim features, the combined teaching of Word 97 and Karaali cannot make obvious claims 22-27. Accordingly, withdrawal of this rejection is respectfully requested.

## **CONCLUSION**

For at least the reasons given above, Applicants submit that claims 1-27 define patentable subject matter. Accordingly, Applicants respectfully request allowance of these claims.

Should the Examiner believe that anything further is necessary to place the application in better condition for allowance, the Examiner is respectfully requested to contact Applicants' representative at the telephone number listed below.

No additional fees are believed due; however, the Commissioner is hereby authorized to charge any deficiency, or credit any overpayment, to Deposit Account No. 13-2725.

Respectfully submitted,

**MERCHANT & GOULD** 

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